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AUTHOR Goodwin, Suzanne
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ABSTRACT

With the number of persons eligible to attend college under the GI Bill on the decline, the volume of Veterans Administration (VA) regulations and reporting requirements is increasing. A survey was conducted to determine the problems that colleges were experiencing with VA certification requirements as a background for discussion of solutions of these problems. Survey instruments were distributed to member institutions of the American Association of Community and Junior Colleges and the National Association of Veterans Programs Administrators, and responses were received from 42% of the nation's community and junior colleges. Study findings, based on responses representing 83% of the fall 1983 veteran student population in two-year colleges and 21% of the veteran enrollments in four-year institutions, included the following: (1) 11% of the two-year colleges and 7% of the senior institutions had been assessed school liability by the VA within the past 5 years; (2) 58% of the two-year institutions had attendance policies for all students, and 24% had attendance policies for veterans only; (3) 76.5% of the colleges indicated that the reporting fee paid by the VA was much below the actual cost of certification; and (4) major problem areas cited included frequency of regulation changes, procedural changes, and VA intrusion into institutional policy. Study findings are analyzed by state for both two- and four-year colleges and the survey instrument is appended. (AYC)

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VETERANS CERTIFICATION SURVEY
A REPORT

Prepared by
Suzanne Goodwin
Tarrant County Junior College

for
The American Association of
Community and Junior Colleges

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AACJC VETERANS CERTIFICATION SURVEY
A REPORT

It is a fact that veteran enrollment in colleges and universities across the country is declining. Entitlement under Chapter 34 of the GI Bill ceases December 31, 1989, and Chapter 32, the participatory program, has not produced significant numbers of veteran college students.

With the numbers of eligible persons on the decline, the volume of VA Regulations and reporting requirements is increasing. Just in the past year the Veterans Administration has issued page after page of requirements dictating standards for academic progress, length of standard class sessions, academic probationary policy, and punitive and non-punitive grading policies. They have redefined matriculation and program changes, required documentary evidence of course withdrawals, and granted themselves the authority to withdraw course approvals if colleges do not follow their guidelines. And all the while, they have pursued liability assessments against colleges with a vengeance.

The veterans certification survey was designed to determine what problems colleges are experiencing with VA certification requirements, and to provide a background for discussion of solutions to those problems.

AACJC member institutions were sent the survey in the November 8, 1983, issue of the AACJC Letter. In addition, the National Association of Veterans Programs Administrators requested and received permission to send the survey to its member institutions in the January 1984 issue of their NAVPA Update.

Response to the survey was excellent. Forty two percent of the nation's community and junior colleges completed and returned the survey.

Response by State

Alabama	40%
Alaska	11%
Arizona	71%
Arkansas	27%
California	38%
Colorado	60%
Connecticut	40%
Delaware	67%
Florida	66%
Georgia	23%
Idaho	33%
Illinois	64%

Indiana	19%
Iowa	50%
Kansas	29%
Kentucky	25%
Louisiana	33%
Maryland	65%
Massachusetts	13%
Michigan	58%
Minnesota	29%
Mississippi	32%
Missouri	30%
Montana	33%
Nebraska	36%
Nevada	75%
New Hampshire	11%
New Jersey	65%
New Mexico	40%
New York	30%
North Carolina	50%
North Dakota	29%
Ohio	29%
Oklahoma	41%
Oregon	47%
Pennsylvania	16%
Rhode Island	50%
South Carolina	42%
South Dakota	25%
Tennessee	33%
Texas	54%
Utah	83%
Vermont	33%
Virginia	52%
Washington	77%
West Virginia	43%
Wisconsin	53%
Wyoming	38%
Guam	100%

Even more significant is the fact that these responses represent 83% of the veteran student population attending community and junior colleges in the fall 1983 term. (This percentage is based on enrollment data supplied by the Education Service at the Veterans Administration Central Office for October 31, 1983.)

In addition to the responses received from two-year institutions, some senior college responses were received. These represented 21% of the veteran student population at senior colleges in the fall 1983 term. While this is not enough data to make conclusive statements, it provides a basis for comparison of policies and procedures at senior colleges and universities to those at community and junior colleges.

RESULTS OF THE SURVEY

Survey responses were analyzed by state, by size of institution, and by liability assessment status. Junior and senior college

responses were reviewed separately.

School Liability - Question 4 of the survey asked if the institution had been assessed school liability by the Veterans Administration within the past five years. Eleven percent of the responding community and junior colleges from 24 states indicated they had been, as did 7% of the responding senior institutions.

The bases for these liability assessments were varied:

	<u>Jr Colls</u>	<u>Sr Colls</u>
30 day reporting deadline	64%	71%
Last dates of attendance	40%	43%
Courses not applicable to program	26%	29%
Insufficient prior credit granted	18%	14%
Other	22%	57%

Junior colleges responding 'Other' listed the following reasons for assessments: seat time, tutoring, independent study, false certification, non-punitive grading, incomplete grades, and standard class sessions. Senior college respondents listed mini-sessions, graduate courses, the state approving agency, withdrawal policies, and independent study in the 'Other' category.

The respondents' liability cases were in various stages of resolution:

	<u>Jr Colls</u>	<u>Sr Colls</u>
Waived by Veterans Administration	50%	28.5%
Paid Veterans Administration	16%	28.5%
Pending a VA decision	24%	43%
Pending a court decision	10%	----

Attendance - Institutions were asked if they had an attendance policy. Community and junior college responses were:

	<u>Liability</u>	<u>No Liability</u>
No	18%	18%
Yes, for all students	58%	61%
Yes, for veterans only	24%	21%

Interestingly, senior college responses were almost exactly reversed:

No	54%
Yes, for all students	34%
Yes, for veterans only	12%

If institutions stated that they had attendance policies, they were asked if that policy had been established in order to satisfy VA reporting requirements. Thirty eight percent of the junior college respondents without liability problems stated that it was, as did 38 percent of the senior college respondents. For junior:

college respondents who had been assessed liability, the percentage stating they had established an attendance policy just to meet VA requirements jumps to an astounding 61%.

The method used for determining last date of attendance by responding community and junior colleges is not uniform:

	<u>Liability</u>	<u>No Liability</u>
Date provided by instructor	40%	41%
Date drop officially approved	24%	38%
Combination*	36%	21%

*Five percent of the institutions with no liability and 2% of those with liability stated that they also use the student's word for last date of attendance in some instances.

The same statistics for senior college respondents provides a somewhat different picture:

Date provided by instructor	17%
Date drop officially approved	61%
Student statement	4%
Combination of the above	18%

Cost of Certification - Question 11 of the survey concerned the adequacy of the reporting fee which is paid by the Veterans Administration to institutions and is based on the Veterans Administration's record of awards made in each facility code as of October 31 each year.

Seventy six percent of the responding junior colleges with no liability and 77% of the senior colleges indicated that the reporting fee was much below the actual cost of certification. Sixteen percent of the junior college respondents and 13% of the senior college respondents indicated the fee was somewhat below. In the case of junior colleges with liability assessments, 84% felt the fee was much below actual costs, and 12% felt it was somewhat below.

In order to make an estimate of the actual costs of certification, responding institutions were asked to provide budget figures to include direct salaries, travel, and office supplies and expenses. This figure divided by the number of veteran students enrolled yields an average cost factor.

There was a wide range of average costs per state with New Hampshire the lowest at \$13.19 and Montana the highest at \$333.49. The average cost of certification for all junior colleges responding was \$76.84 per student; at senior colleges the average cost was \$67.92. For junior colleges with no liability assessments, the average cost was \$73.56, but for junior colleges with liability assessments the cost soars to \$93.31 per student.

Problems - In order to identify the extent to which VA certification poses a problem to institutions, respondents were asked to

rate such problems on a scale ranging from none to large. Forty two percent of the junior college respondents with no liability assessments rated their problems moderate to large, as did 43% of the senior college respondents. Predictably, 64% of the schools with liability assessments answered moderate to large, with 40% of these indicating large.

Next, respondents were asked to cite what, specifically, they perceived major problem areas to be. On this question, multiple responses were allowed. An overwhelming 93% of all responding community and junior colleges and 97% of all senior college respondents indicated that they perceived problems. However, what these institutions perceived as problems differed:

	<u>Jr Colls</u> <u>w/o liability</u>	<u>Jr Colls</u> <u>w/liability</u>	<u>Sr Colls</u>
Frequent reg changes	54%	70%	60%
RO procedural changes	36%	46%	38%
Communication with RO	35%	44%	40%
SAA	15%	18%	9%
VA intrusion into institutional policy	31%	46%	38%
School liability	12%	44%	18%
Last dates of attendance	24%	48%	26%
Transcripts/degree plans	35%	30%	39%
Frequency of certification	37%	32%	47%
Other	21%	16%	22%

ANALYSIS OF THE RESULTS

It is evident from the survey that the Veterans Administration is intruding into academic policy with its reporting requirements sometimes making it necessary for institutions to establish separate policies for veteran and non-veteran students. There is inconsistent interpretation of the regulations by different Veterans Administration Regional Offices, and a resulting inconsistent application of the laws governing use of the GI Bill. The VA reporting fee is inadequate as a reimbursement of certification costs. And, school liability assessments are being used effectively by the Veterans Administration to force institutions into compliance with its requirements for education.

Title 38, USC, Section 1785, states that liability assessments may be charged against any institution who is guilty of "willful or negligent...failure to report...excessive absences from a course, or discontinuance or interruption of a course by the eligible person or veteran, or false certification by an educational institution". This has been interpreted by the Veterans Administration to also mean late reports (which they define as reports received by them in excess of thirty days from the student's last date of attendance) or failure to implement procedures to meet VA reporting requirements. School liability is presented as a threat to colleges across the country under the guise of reducing overpayments.

The survey indicates that less than one-half of the Veterans

Administration Regional Offices are actively pursuing school liability assessments. This suggests that not all Regional Offices view the institution's role in the overpayment situation in the same light since we must assume that all institutions are being required to report under the same set of guidelines. Further, of those cases assessed against responding community and junior colleges, 50% have been waived by the Veterans Administration itself.

The law grants authority for an assessment of liability against an institution only if that institution is willfully disregarding the requirements of that law...in other words, that institution is breaking the law. The preparation of liability cases is time consuming and expensive both for the Veterans Administration and for the institution. If 50% of the liability assessments were made without sound legal basis, then the entire assessment procedure in use by the Veterans Administration is meaningless and wastes the resources of both parties. If on the other hand, these cases were waived because those institutions agreed to follow Veterans Administration dictates of educational practice, then liability assessments can be said to be an effective club to hold over the heads of errant institutions.

Survey statistics appear to support the latter premise. There is a sharp increase in junior college respondents who take attendance just to satisfy Veterans Administration requirements once liability is assessed, and a like increase in concern over Veterans Administration intrusion into academic policies and procedures. In fact, concern over certification problems in general increases for schools that have experienced liability assessment.

Survey information concerning attendance is also quite revealing. Although Title 38, USC, Section 1784, does require institution's to be able to establish and report a veteran student's last date of pursuit in a course, it does not give the Veterans Administration the authority to require daily attendance-taking. In fact, Section 14203 (a) (3) of the VA Regulations specifically prohibits such a requirement from being placed on an institution certifying standard college degrees. However, many Veterans Administration Regional Offices request information from schools which could not be gathered any other way. In many cases, the Regional Offices define last date of pursuit as the actual last date the student sat in the classroom.

The vast majority of community and junior colleges responding to the survey have attendance policies (82%). Survey statistics indicate that for many of these the Veterans Administration Regional Office is dictating such policy. Thirty eight percent of the junior colleges without liability assessments, and 61% of the junior colleges with liability assessments, have been forced to establish attendance policies to meet VA reporting requirements. It is also apparent that they do not dictate similar policy to senior institutions since only 46% of these have attendance policies. It appears then that many Veterans Administration Regional Offices have successfully equated quality education with daily attendance, at least for community and junior colleges.

The methods in use for establishing last dates of attendance

vary among responding institutions, although the survey does indicate that for community and junior college respondents the emphasis is on dates obtained directly from instructors. At senior institutions the official drop date is most widely used. These disparities show that not all Veterans Administration Regional Offices define last dates of attendance in the same manner. This highlights the lack of consistent interpretation of the law from region to region, and by type of institution as well.

The responses made by all institutions to the question dealing with specific problem areas reveals a great deal of disparity. It is assumed this same disparity must exist among Regional Offices. Some Regional Offices are apparently intent upon regulation attendance while others are more concerned with transcript evaluation and degree planning. That the Veterans Administration wants to regulate all aspects of higher education is obvious, but to what degree is not consistent.

The survey also indicates that institutions are not being adequately reimbursed for the costs involved in certification. Presently, the VA reporting fee is \$7.00 per student with an additional \$4.00 for each advance payment, and is paid according to the Veterans Administration's enrollment figures as of October 31 of each year. This is only about 10% of the cost per student indicated by the survey. The cost of certification should be a shared cost between the Veterans Administration and the institution, but the division of such cost should certainly be more equitable than a 10/90 ratio.

For a point of comparison, campus based federally funded student aid programs (SEOG, college work-study, NDSL) have an institutional reimbursement for administrative costs of 5% of the total dollars disbursed. For Pell grants, the institution receives \$5.00 per grant disbursed to enrolled students.

Certification costs become even more pertinent as the Veterans Administration implements its term-by-term certification requirement with the fall 1984 enrollment. Monthly certification of NCD students went into effect in March, 1984.

CONCLUSION/RECOMMENDATIONS

Reviewing the statistics from the survey as a whole, and the comments made by individual institutions, it is apparent that there is a need to effect changes in Veterans Administration policy in order to prevent further intrusion into academic prerogative and provide relief from present cumbersome requirements. The point seems to have been reached where the problems connected with VA reporting have forced educators to become more concerned with compliance with regulations and avoiding liability assessments than with serving the veteran student population. This is contrary to the philosophy of higher education and to the stated purpose of the GI Bill. Educators as a group need to take steps to insure that the criteria for quality in education is established by the education community, and not by the federal bureaucracy.

Following this premise, these recommendations are made:

1. An educational task force should be established, comprised of representatives from both professional organizations and institutions of higher learning, that would assume responsibility for monitoring VA reporting requirements for the purpose of insuring that regulations are not promulgated or implemented without direct input from the education community.
2. A concerted effort should be made to insure that federal requirements for reporting are uniform nationwide, that interpretations of the law and the regulations are made at the Central Office level rather than the Regional Office level, and that community and junior colleges are required to monitor and report on the same bases, as senior colleges.
3. Immediate steps should be taken to encourage Congress to increase the reporting fee paid to institutions to at least 50% of the cost per student for certification, and that such fee be based on actual unduplicated headcount per annum at each institution.

JUNIOR/COMMUNITY COLLEGE
COMMENTS BY STATE

Alabama: "The VA office should be able to certify documents needed for benefits."----"Our institution has been experiencing a problem with non payment for all hours certified. The hours shown under independent study are repeatedly overlooked with payment made only for hours shown under the credit hour column."----"New certification requirement would triple work load."

Alaska: "I received no training and have had to learn procedures by trial and error, many times getting inconsistent information from the VA office."

Arizona: "When we make inquiries about pay or other problems to the Veterans Administration, instead of receiving an answer in one or two days as was the case a year ago, it now takes one or two weeks or more. Needless to say, we are having more and more disgruntled veterans. Budgetary and personnel problems are part of the problem in the Veterans Administration, we realize, but it is difficult to continually make excuses to a hungry or angry veteran."----"I have few problems with working with the VA or complying with the regulations in a manner consistent with both school and VA policy."----There is "lack of communication between the Education liaison staff and adjudication; poor attitude and lack of proper information available with those handling the toll-free telephones; VA's lack of fully understanding a student's need to change programs more than the allotted times during their period of eligibility and/or at one school."----"Thank you for identifying and assisting with this problem. Your time and effort is greatly appreciated."

California: The VA reporting fee "doesn't even pay telephone and postage."----"We were told to call in certification changes, often impossible to get through by phone....We have not had paid VA personnel at our college for the past four years. The closest VA rep is at Jerry Pettis VA Hospital in Loma Linda - approximately 85 miles away. Our vets have a difficult time having birth certificates, etc. certified. If VA accepts the college's certification for educational benefits, why can't they accept our certification of various documents?"----"VA requirements sometimes conflict with locally established procedures."----"Due to the phasing out of the Veterans Administration Representatives on campus, VA has completely isolated itself from the population of veterans within higher education."----An additional concern is "VA approving community college certificate programs, then trying to assess them by vocational school standards."----"We perceive no problems with VA certification."----An additional concern is the "non conformity of answers given by target people to the same question; three different people give three different answers to the same question or simply try to brush the veteran off instead of trying to be helpful...In all fairness, there are many truly helpful and caring target people, but those who are not are very detrimental to the entire facility."----"Institution filing an appeal is discriminated against in that the hearing officer and panel consists of the same office and possibly the same personnel that levied the institutional liability. Therefore, the hearing is partial and prejudiced

in favor of the Veterans Administration. It is, therefore, in violation of the institution's rights to an 'impartial hearing'." ----"If the VA would respond to our concerns as quickly as they expect us to report changes on a student enrollment to them, it would be much better. I do not find the quality of administration by the VA to be satisfactory at all." ----"Accelerated courses, (short courses), require the use of a formula for each individual course. This is too time consuming and cumbersome for the institution. It is required by the VA to report standard class sessions... The documentary evidence procedures are too rigid. As a result problems occur too frequently at the institution...The verification of prior credit reporting requirements are ambiguous and administratively hard to keep clear...The requirement for an institution to complete VA form 22-6553 is redundant...VA decisions should be subject to judicial review." ----"VA constantly loses paperwork and misinterprets accelerated equivalencies."

Colorado: One concern is "the amount of certified copies required and repeated requests for the same information." ----The "reporting on NCD vets process is too complicated; should be the same as IHL vets...NCD vets are paid and evaluated because of clock hours instead of credit hours like it is for IHL vets. However, this is a congressional decision not affected by the VA. The VA has no control." ----There is "no opportunity to communicate directly with VA Adjudication Division to resolve problems."...Also concerned with the "inability of the Adjudication Division to make timely educational awards. Average time is 67.4 days."

Florida: "VA's new policy of requiring schools to count and report the exact number of Standard Class Sessions (SCS) along with the credit hour measurement on each certification document pertaining to a summer or miniterm, serves absolutely no purpose except to add another burdensome reporting requirement on schools...Term by term certification will easily triple the workload of most any school charged with the responsibility of certifying veteran students for educational benefits. Schools simply cannot afford to pick up the tab for the additional administrative costs associated with this VA proposal, nor should they have to. If VA is unwilling to increase reporting fees to a level commensurate with the increase in costs (\$21.00 per VA student), then this proposal should be shelved--permanently. Otherwise, many schools across the country will certainly extricate themselves from VA certification and it will be the Vietnam era veteran who will eventually pay the price for term by term certification." ----"Regs do not provide for institutional discretion." ----"I can readily see that we are going to have many problems by having to do separate certifications for each semester. This not only causes problems for the school, but the veterans as well." ----Another concern is "VARO telling students we have not sent their paperwork when in fact in some extreme cases we have sent it 4 and 5 times, twice being average." ----"Term by term certifications will be horrendous. Calculating 'standard class sessions' for short terms is totally unnecessary. Should return to the old formula." ----"The new requirement to report the number of standard class sessions, in addition to semester hours, in any non-standard term (summer)...will cause an interruption of VA benefits checks twice a year as well as the submission of more forms and additional information." ----"According to St. Petersburg VARO officials, changes in regulations are designed solely

to eliminate overpayments with no concern for additional workload or hardships to veterans."----"VA personnel attitude is superior and condescending"...Our school liability "suit covers the years 1972-1976. Since that time, we have revised procedures eliminating any flexibility for veterans' individual problems. Current excessive and timely procedures are not being considered as a defense in the liability case as we have had excellent VA audits of late. Finally, it appears we do not have the benefit of 'equal protection' since the VA is holding us liable but many California schools with the same problems during 1972-1976 have been 'forgiven'."----"Telephone answering unit in Regional Office does a par job. They frequently answer veteran inquiries, 'We haven't received anything, go see the school,' without checking files."

Georgia: "I am concerned with the VA's proposed regulation that would require enrollment certification by term rather than by academic year. If approved, this regulation will impose unnecessary hardships on the certifying institutions by doubling, tripling, or quadrupling their certification processing depending on their term length. Even more important, the regulation may cause veterans receiving benefits to have breaks in their payments because of the delay in certification processing caused by the additional paperwork imposed on the institution."----"There are numerous inconsistencies within the VA as to implementation of their own regulations. Actually their changing of interpretations are almost constant and apparently never ending. If they would follow the regs and laws Congress passes with as few interpretations as possible and above all be consistent, our problems would be minimal."

Illinois: The VA reporting fee "would not cover data processing cost, let alone staff, etc."----Certification is a "bulky and cumbersome task, but possible liability is a constant threat. Students learn to circumvent carefully established procedures."----"The VA and many community colleges are not meeting veterans needs for flexible educational planning targeted at finding employment in a very competitive job market. 'An identified program' in contemporary society and employment conditions is archaic."----"The Regional Office reports to the veterans that the certification has not been processed or received when in fact it has been received but is in Adjudication or some other office. Also, overpayments are usually not adequately explained."----"VA seems to hinder rather than assist vets in educational endeavours."----"I have had problems getting consistent answers from VA phone unit...I have had difficulty getting a complete copy of VA regulations from the VA."----My "major concerns are the increasing VA intrusion, asking for information already provided, NCD course credit should be same as semester hours."----"We realize that many reports of attendance are necessary. However, the VA reporting fee is inadequate when most veterans require 3 to 4 reports and changes in attendance each semester. A lot of time is involved preparing these reports and obtaining last dates of attendance from instructors."----"The VA is not approving the extension and is stating no reasons as to why the approval and extension has not been granted. At this time it is a waste of the veteran's time to request an extension."----"Definite facts should be made known on anything new, such as the extension program for veterans."----"VA attitude of higher education is pre-1950 and does not appear to flex, re: the needs of returning adults."

Indiana: "For me the quality of communications with our regional office had been 100%. I could not ask for better people."

Iowa: My concern is "lack of adequately trained personnel to handle problems on the VA officer; lack of consistency among adjudication personnel...loss of or misplacement of files by VARO and the philosophical attitudes of adjudicators--some strict hardliners--some try to be human." ----"VA will not approve parts of some programs that are available to all students. Approval criteria too inflexible, rigid, and arbitrary...unrealistic record keeping inspections by VA...VA compliance visits and inspectors--some are obnoxious, detailed, others are helpful, reasonable, and later demoted...inconsistencies in rules/regs/DVB interpretation between neighboring state VARO's...Regional Office is 3 to 5 weeks behind--understaffed." ----"I hope your survey does raise the level of concern of the added difficulties raised by the proposed regulations among community and junior colleges." ----"VA should alert college re:VA 'history' of 'problem vets' instead of 'auditing' after the fact."

Kentucky: "We have been taken to court once--decision in favor of the college. But this threatening situation is a bad way to conduct business. The 'last date of attendance' business has been a nuisance for 10 years--VA personnel are obviously still living with a WWII/Korean war situation in mind. Attendance went out the door long ago." ----"If certification is required each semester, VA students will be hurt financially. Most VA students rely on their VA monthly payment to live on. Any break in payments would be a hardship."

Louisiana: "Slow processing of cert cards by New Orleans office results in delayed payments to veterans who need the funds to stay in school."

Maryland: My concern is the "lack of regulations, handbook, VA training sessions...Monthly certifications would create a tremendous paperwork burden on all colleges." ----"The major problem as we perceive our relationship in advocating for our students with the VA is that the approval of benefits is too slow. For example, as of late November, we still have nearly 10% of our veteran students who have not received their first benefit payment for this Fall semester." ----"My primary concern is with delays in VA processing of transfer students." ----Our college's "Veterans Affairs Office changed its reporting format to the Veterans Administration from school-year certifications to semester-by-semester certifications approximately seven years ago due to the adverse publicity concerning the abuses of the program which precipitated a windfall of new and revised VA education regulations, as well as stricter enforcement by the Veterans Administration and heightened activity to assess institutional liability...We are, therefore, already in compliance with the proposed regulations and unable to negatively respond to the regulations since it was our decision to do the semester-by-semester reporting. We are familiar with the additional workload because we KNOW from firsthand experience how heavy the burden is. We are experiencing anger from student veterans and/or spouses for reporting them for illegal coursework. We must also take time from our busy schedules to reply to Congressional representative and VA inquiries as they come through the system from complaining students. It seems as though the paperwork is ever increasing and there is never enough time

to 'catch up'...As a student financial aid officer who also administers other federal programs, the VA regulations and actions appear to me to be repressive, intimidating, humiliating, and insulting to veterans seeking assistance. I suspect that the regulations and procedures contribute to the declining student veteran enrollment in higher education."-----"Paperwork for such a small group is time consuming and detracts from attention to larger body of students."

Massachusetts: "It has been my understanding that the VA has no understanding concerning the reporting requirements on institutions. They believe that all schools are making money off of veterans and reporting fees. There is no understanding that the certification requirements are at the same time as the heaviest registration and admissions activities."-----"When a veteran has not received his benefits within a reasonable time, I find it difficult finding out why! I want to be able to speed up the process if it's lack of information on the veteran's or college's part."

Michigan: I am concerned about "the inability of the VA to provide students with concise answers re: the status of their benefits."-----"There is inadequate communication between this office and the Regional Office and State Approving Agency."-----"Toll free assistance clerks are basically incompetent and extremely insensitive."-----"our Detroit VA Regional Office has been consistently good in responding to our out of the ordinary VA problems."-----I am concerned about the "discourteous and unhelpful attitude from phone workers at the Regional Office...much concern over term by term certification."-----"The extension program... too much gray area and ways to interpret."

Mississippi: My concern is "no action on certifications with problems."-----"There are no manuals available to new administrators for the Veterans Programs. More in-service workshops should be held to keep institutions in contact with one another as well as inform us of regulation changes on both the state and federal levels. The State Approving Agency should exhibit a more cooperative attitude in regard to institutional policies."

Missouri: We have "problems with certifying a four year student in a summer course which applies to his degree so he can live at home. Also, to warn students about the type of delay in payment when a change in program is submitted."

Nebraska: "VA Regs do not fit community college procedures...Attendance reporting for NCD programs is very difficult and time consuming. Also appears unnecessary when one considers that this Diploma is approved on a credit hour basis and is identical with the first 4 quarters of the Associate Degree program. This presents the problem of differential treatment of VA recipients attending identical classes."-----"Perceive no problems at this time."-----I am concerned with "VA inflexibility in dealing with individual cases; differences in interpretation of VA regulations by different VA personnel; processing time of claims, letters, etc."

New Jersey: I am concerned with the "length of time needed by VA before students begin receiving their monthly subsistence checks and the length of time needed to correct errors to monthly subsistence amounts."-----

"Amount of VA paperwork is significantly out of proportion to the number of students served."----"The lack of one manual on reporting procedures supplied by the VA...DVB Circulars too cumbersome to keep track of."

New York: "VA award processing time has increased, delaying the veteran's benefits...various forms requested by Regional Offices cause delays in award processing."----My concern is "the Regional Office not informing us of new forms."----"Much of this responsibility should rest with the Vet himself and VA...If a card was sent to Vet for Instructor's signature and then returned directly to VA regional, it would be more efficient and less time consuming. If Vet didn't submit this card, checks would be halted automatically. This procedure was done by VA after WWII...Academic progress also could be checked by VA regional merely by receiving a copy of the Vet's transcript. Vet would be required to submit an official college copy."----I am concerned because of "VA certification forms sent to college to be completed by the school official."----My concern is "check payment problems being blamed on school."----"It often seems that VA adjudicators are lacking in knowledge/training, creating problems for all...different adjudicators handle same problem/case in differing ways...not enough training by VA of college personnel either to ensure good communication via VA forms."----My concern is "length of time it takes for VA regional office to complete processing of veterans' papers... Attendance requirements for one-year certificate students are cumbersome to handle."

North Carolina: My concern is "lack of consistency in interpretation of VA regulation."----"Often VA Regulations do not follow the intent of the law."----"VA never seems to process payment for changes of program the same way, some pay for break between terms correctly, some don't, depending on the individual adjudicator...It appears the VA keeps proposing tougher rules in order to justify keeping the number of employment positions."----"Am concerned that VACO, VARO's, and SAA's will increasingly 'chase butterflies' to keep their personnel busy as enrollments continue dropping. Also concerned about taxpayer dollars and VA's cost effectiveness. Agree that 'Mickey Mouse' is becoming more burdensome to colleges, especially the upcoming 'term' certification beginning next Fall. Equitable reporting should apply for both IHL and NCD veterans."----"We really haven't had any problems except for the attitude of a slightly over-zealous federal employee who once audited our records.. Try as hard as he could, he didn't find any problems. He then tried to manufacture some."----I am concerned "especially about the VA telephone unit continually telling vets who call in that the school has not sent in paperwork on the vet when the school definitely has sent it in. This does not benefit good communication...Any additional reporting requirements would be a highly unnecessary burden on the school and it would be an increased burden."----"We strongly oppose quarterly certification."----"Paperwork appears to be increasing greatly as the number of veterans eligible for educational benefits decreases. This keeps an unnecessary number of people on a payroll supported by tax dollars...We still receive 22-1999-1 forms which are expensive and unneeded. These proposed changes represent make-work for the Veterans Administration and an unnecessary cost to educational institutions. The system should be streamlined to make reporting easier. Procedures which are not problems should not be 'fixed'. Our biggest unnecessary time-

consumer is calculating attendance by the hour and prorated days for high school and vocational programs. This needs to be 'fixed' instead of adding more work."----My concerns are "unequal treatment of degree and non-degree students, length of time to process applications at VARO, and inconsistency in interpretation of laws by regional office."---I am concerned about "the VA requesting unnecessary information, such as class schedules on vocational programs, 85/15 on branch schools within commuting distance."----"As there are fewer and fewer veterans, rules and regulations are becoming more and more strict. Reporting of absences required for NCD (including break days) alone is not fair. Why report absences for NCD students and not IHL?"----My concern is "lost papers by VARO."----"Disproportionate share of responsibility on the college, not enough on the student (veteran)... With regard to the proposed changes in VA certification procedures: existing VA regulations are sufficient to prevent overpayments. They need only to be uniformly enforced by VA at all institutions...The proposed changes will significantly increase the VA records and reporting workload. This workload is already inordinately high when one considers the number of students served and the reporting requirements for other federal aid programs...The problem of overpayments identified by the GAO deserves to be addressed. However, the problem is not the result of defects or weaknesses in the existing reporting procedures and regulations. Overpayment amounts are very low at institutions that conscientiously comply with existing regulations. The Veterans Administration should look to its own compliance and enforcement policies and procedures for a solution to the problem of overpayments rather than to another layer of red tape that is unnecessarily punitive toward institutions, such as this one, that are not a part of the problem."

Ohio: "VA errors in processing vet records create problems."----I am concerned about "the length of time it takes to process and confirm certifications." Concerning Question #13, "none of these have been a major problem, but, in the course of daily operations, most of these arise periodically as minor irritations and nuisances."----"Attendance/tardiness requirements for non-degree..this reporting is silly...While much attention is devoted to the small administrative concerns like attendance, the VA has not found a way to control the more important problem of stopping students early on that take the money and run."----I am concerned by "VA personnel lying to vet about who created the problem."----I am concerned about the "decrease in training provided by the VA for certifying officials, the different interpretation of VA regulations as received from State Approving Agency versus the VA Regional Office."

Oklahoma: "I feel that more responsibility of the reporting procedures and therefore the liability of overpayments should be shifted to the student rather than the institution...Because the Veterans Administration pursues institutional liabilities, it indicates to the students that it is the institution's full responsibility to report changes in the student's status and to monitor that each course is pertinent to the student's degree objective, etc. This negates the student from fulfilling his/her obligation to the federal government when receiving veteran's educational assistance...Also, regulations (such as last date of attendance, payment for repeat courses, etc.) are maximally enforced

at the junior colleges but minimally regulated at the universities."
----"The VA is going to have to realize that institutions are going to be reluctant to do their work for them in the future unless they budget money for a certification fee increase...Also, they make many rules which affect our work on their paperwork without giving us a chance to be heard. Then, on top of that, when you 'screw up' they enjoy zapping you with a compliance survey. Along with this, they expect you to send in all of the paperwork but when they communicate they do it directly with the vet. In other words, we are often the last to hear... lack of consistency of thought pertaining to many facets of education... a single person in VARO can believe something ought to be interpreted differently and a policy is changed to meet that whim...a year later they change back."

Oregon: "Changes in regulations are often not received in time to prevent making multiple recertifications necessary."----"If we go to quarterly certs, it would be beyond the bounds of reasonableness and outside of our manpower capabilities."----"Term by term certification will increase reporting burden 250%. Local resources are unavailable to support increased manpower needed."----My concern is "increasing regulatory demands that require staff we have no money to hire."

Pennsylvania: "The Regional Office loses too much paperwork...approximately 10% per semester."----"VA is slow in processing claims...Certification on a semester basis will double the paperwork for the VA and will interrupt continuous payment to veterans when they need the money for upcoming tuition. This creates additional work when we have continuous reduction in funds."----"The duplicating of material sent to VA because of their loss of the paperwork...Some has had to be duplicated as much as 4 or 5 times."----The VA reporting fee "is approximately 12% of the total cost."----"The process of certifying official documents cannot be done by the College. This causes a delay in the total process of certifying veterans for educational benefits. Also, our school records may lack official VA documents pertaining to our veterans because our local VA office in Wilkes-Barre must certify these documents before the veteran can receive educational benefits. The documents are not always mailed to our school office from our local VA office. This delays the veteran's registration process...Enrollment certifications sent by our school to Philadelphia are sometimes lost in transit...There is some lack of communication between educational institutions and Philadelphia in regards to eligibility requirements for educational benefits for the veteran...The VA Office in Philadelphia does not rapidly acknowledge veterans who have a change in credit hours or dependency status during the course of a semester. This delay could result in an over/under payment of VA benefits to the veteran."

South Carolina: I am concerned about "submitting duplicate information... all information on VA form 22-6553 previously submitted...all information on VA form 22-6553A previously submitted except days of absences... NCD vets not receiving checks on time the last month of quarter due to processing cert cards."----"VARO Columbia, South Carolina, provides excellent services, as well as SAS...Counseling veterans concerning frequent changes in VA Regs, academic and personal problems consumes more time than certifying them. Veterans seem to have so many personal

problems."----"I feel the VA lacks concern for the veterans or the schools and burdens the schools with more and more paperwork for fewer veterans and unfair compensation...appalling."----"Why the difference in policies with IHL and NCD? I can see why it should be some, but I'm sure if the law makers would take a closer look they could eliminate some of the problems. One that I can think of, the procedures for refunds which I'm sure all schools with NCD veterans have a problem with. I feel that if students drop out of school for no reason or just walk off and do not make out an official withdrawal, the school should not have to run him down to give him a refund. I have addressed this problem to the VA many times and all I get is that's the law. If the lawmakers knew the problem the schools are having I'm sure it could be changed."

South Dakota: "Regulation changes are massive...send those pertaining to our form of training...would take a lawyer to digest them."

Tennessee: "This institution has been disallowed the certification for pay of deficiency/remedial courses. These courses appear on the transcript, but are not acceptable as graduation credit. This policy causes many veterans difficulty in preparing for a curriculum."----"Do not want to increase reporting requirements such as quarterly reporting."

Texas: "Each counselor at VARO has different explanation for an occurrence...usually telling the student it is the school's fault."---- I have "difficulty in reaching regional office by telephone."---- "General compliance with VA regulations is very difficult."----"After solution of problems concerning non-receipt of pay, there is an undue delay in receipt of benefits...VARO now requires both credit and class session status on summer certifications even though the catalog clearly states the equivalency. Aside from the additional typing, schedule changes involving combined six and twelve week sessions will be confusing for VARO to interpret...Undue hardship is often caused when benefit checks are delayed an entire semester due to a change in course objectives. This happens even when verification of professional academic counseling is submitted with the request for change....Veterans are often led to believe that the school is at fault if certification is not yet in the VARO computer system. The college has to explain the 60 to 90 day VARO system to the angry veterans...Many unnecessary calls and complaints are received when benefits are reduced or cut off with no prior notice of possible problems...The responsibility for accepting a check for which there is no entitlement must remain with the student: therefore, the increasing tone of 'school liability' is unwarranted.... Certification on a semester to semester basis would increase the possibility of clerical errors, loss of paperwork, and would prevent the veteran from depending on the VA benefits for living expenses."----"I'm responsible for hundreds of thousands of dollars in benefits, but cannot be relied upon to furnish copies of 'original' documents to the VA." ----"I am concerned about the general procedure for conducting compliance surveys, VA laws not keeping in step with modern educational trends, VA's views of credit not completed under the GI Bill."----"VA office telephone counselors say its a school problem when the student calls when checks are delayed."---- I am concerned with "lack of consistency in application of rules and rules which are placed in effect retroactively... School liability rules are not clear and too open to interpretation by

VA to its own benefit."----"VA should back off and let State Approving Agencies take care of education! It is felt that the present practices utilized by VA is the cause for the decline in veteran's using their GI Bill...too much hassle!...Before Target, it took six to eight weeks to get educational allowance started to the veteran. After Target, it takes six to eight weeks to get the veteran paid. Now we may have to live with EVERY semester hassle!...It seems that every day we receive a 'new' proposal from our servicing RO's and/or Central Office which in effect impedes the ability for the colleges and universities to provide services for vets who have honorably earned them through their services to this country...It is hoped that the motives behind all of the 'new' proposals are not designed to save FEDERAL DOLLARS through hassling veterans out of educational pursuits...our nation will suffer if it is."

Utah: I am concerned with "schools being penalized for students irresponsible behavior. The veteran student should be more accountable. Time spent with vet responsibilities far in excess of the compensation by VA for services."

Virginia: "I feel that the Roanoke office does a good job of assisting me in dealing with veterans but the new regulations requiring reporting of credit and contact hours will cause great problems!...also, the unfair treatment of certificate-diploma students compared to degree students in terms of certification for full benefits and for absences. I feel they are penalizing the veteran rather than the institution or program for their inadequacies. Why not allow accredited institutions where the student is going to have certified programs be considered in one group and fly-by-night schools in another group? It is possible for two of our students sitting side-by-side in classes for one to be full-time and one half-time. This is not fair and causes numerous problems for every one."---My concern is the "slowness of regional office."---My concern is "the possibility of doing away with the VA workstudy program. This is vital if the college is to get all of the paperwork done in a timely manner."

Washington: My concerns are "termination of services provided by VA such as call-back unit; increasing length of processing time by VARO due to lost documents, duplication of verification, simply not processing and insufficient number of employees."----"The VA has been considering quarterly certification. This would place a tremendous burden on certifying officials, the VA Regional Offices, and the veteran. This burden would be unacceptable."----I am concerned about the "delay in payment to new VA funded students who often must drop-out of school prior to receipt of first check due to the long period before first check is received."----I am concerned about the "amount of time if the quarterly certification becomes effective...The survey is rather negative when actually there are many positive benefits to colleges. My main concern or objective would be to increase the reporting fee."----"The decrease in VCIP funding and the increased reporting requirement combine to make institutional service to veterans near impossible."----"Under the current annual certification procedure, overpayment does not exceed an estimated 5% at this institution. Under the quarterly certification system the probability of overpayment to veterans will increase immeasurably. In

order to insure continuous pay, most schools will send subsequent certifications to VA regional offices 6 to 8 weeks prior to the beginning of each quarter to attempt to insure continual pay. During that period of time students often change their total number of credit hours and/or standard class sessions. This change would then require additional and burdensome paperwork with a resultant change in pay status and high probability of over or under payment....The only justification that appears to warrant term, quarter, or semester certification is to increase the workload for VA administration agencies in view of declining VA enrollment. This does not counter the disadvantages cited above to justify this change."-----"The Veterans Services provided are complex yet routine, but it is 'paper intense'. Increasing the level of paperwork two to three hundred percent would multiply our liability risks and create a need for additional staff. Beyond veterans services there would be other offices across the campus that would feel the pressure of more time needed for veterans records. These increases that we project would come at a time when now our VCIP allotment covers only 14% of our service costs and that is reduced each year. In summary, the proposed changes would inundate the veterans unit and other college offices and decrease the efficiency that we have established. All college budgets have been greatly reduced. It would be difficult to maintain the service levels and continue to stay free of liability problems."-----I am concerned by the "necessity of obtaining a report from instructors of the hours 'arranged' each week for an arranged class; reporting credits by types of training such as regular, independent study, TV, work experience, and name and number of deficiency courses."-----"The VA reporting fee should be targeted exclusively for veterans' services, pending a substantial increase in the VCIP budget."-----"Interpretation of regulations and procedures are inconsistent...amount of time necessary to process claims."

West Virginia: "Insufficient financial resources to operate office. Lack of a clear and concise educational development plan to assist Viet Nam era veterans in obtaining long range employment. Korean veterans had until 1976, why not Viet Nam era veterans?"

Wisconsin: "I am against semester certification. We could not afford to process absence forms for all A.A. vets."-----"We currently have a good working relationship with the Milwaukee VA Regional Office; however, national policy could at any time bring about pressure to actively pursue the school liability issue in Wisconsin. School liability was last assessed against us in the mid-1970's."-----My concern is "inability to get a line into VA Regional offices, other than the toll free number students use...Changes in regulations/reporting requirements this year still have not been communicated to us in writing...Poor attitudes and treatment of our employees and students when calling VA."-----I am concerned about "cut in services of Regional Office to our institution, directly related to cuts in their staff. In spite of the decrease in number of veterans attending problems per veteran are more numerous. Problems seem to be getting more complex."

Wyoming: "Totally inadequate reporting fee."

SENIOR COLLEGE
COMMENTS BY STATE

Alabama: My concern is "nonreceipt of written specific instructions from VARO when a conflict develops in interpretation of VA Regulations... also, loss of paperwork by VA...had to send three enrollment certifications to VARO before a veteran was paid during fall quarter 1983."

Arizona: My concern is "retroactive assessment of liability -- much beyond that which would be accepted by VA."----"They're driving me crazy."----My concern is "excessive time in processing certifications. Also, lost paperwork at the VARO, incorrect response/information provided to vets by phone."

California: My concern is "new payment system which does not inform schools of disbursements from St. Paul, this hampers our ability to accurately communicate with social agency."----"Personnel at the Los Angeles Regional Office are uniformly cordial, but for some reason, perhaps understaffing, problems with veterans' benefits payments are greater than when there were larger number of veterans. Our office has often had to certify, then recertify, sometimes two or three times, before a veteran is paid. About 50% of our veterans have had serious delays in their benefits payments--only our emergency loan fund has kept them in school. To make matters worse, when the veteran phones the Regional Office to inquire about their late checks, telephone room personnel often tell them 'The school never sent in your paperwork.'....A major concern reverts to question 11, that of the VA reporting fee. We have just received the VA's annual reporting fee enrollment statement. The amount they have granted us will not pay one fourth of the salary of a clerical assistant with the skills to perform the work required. Another problem with the enrollment statement is that a sampling reveals that over 10% of the veterans we certified do not appear on the list, and two-thirds of those not appearing on the list received advance pay. In addition, we are not paid at all for certifying those students who drop out early in the fall semester, or who attend the spring or summer sessions only."----My concern is the "uneven application of regulations from one regional office to another."----I am concerned about "too few information sharing workshops where I learn what was contained in the circulars that I didn't receive....the amount of work involved in remaining informed regarding VA Regs when the vet enrollment is so limited."----I am concerned by "delays, bureaucratic bungling...VA not responsive to vets."----I am concerned that "governmental budget problems will cause veterans to lose their deserved benefits."

Colorado: "Although we have not recently had liability assessed, there was in the mid-1970's. Also they have (1983) told the SAA to pull our approval because of inability to establish last dates of attendance, but charging no liability...Approval has not been pulled, issue appears to be on hold."----I am concerned about "inconsistencies in adjudication of cases, loss of certification/application paperwork in the regional office, difficulty in contacting VA Regional Office officials in solving local problems regarding veterans benefits..."

My primary concern regarding the frequency of changes in regulations is the increasing amount of burden that is placed on the veteran. It seems that each piece of legislation that is passed places one more stumbling block between the veteran and his/her earned benefits, i.e. certified copies of all supporting documents. I feel the Veterans Administration is using the Federal Register as a means of passing some of their unreasonable requirements. They know that the Federal Register is not a document that is readily available to a large number of people. It only requires a publication period of 90 days before any proposals become law, hence a new change in their regulations." ---- "not enough coordination of OVA offices...only one line to Veterans Administration."

Florida: "The VARO frequently establishes procedures which are not promulgated by the Central Office which are later rescinded. Many cause financial hardship to the veterans and others. The RO has no concern for veterans...only their own positions and jobs."

Idaho: "VA Regulation too often seems to ignore normal education methods...too often you cannot be paid or receive a reduced amount for pursuing a program at the same rate and method of other non-veteran students."

Illinois: "A student who pays full time tuition should be paid full time benefits for entire trimester regardless of type of course taken. If a person is making full time progress toward degree he should be paid as such."

Maine: "IHL's operating on a semester calendar should be able to certify semester loads, as it stands now an IHL that disaggregates the semester is required to report more often."

Michigan: I am concerned about "failure to reference discovered 'discrepancies', i.e. what regulatory document governs." ---- "Sometimes we cannot find out from VARO exactly what the problem is when a veteran does not receive payment."

Montana: "As long as VCIP continues to be cut each year I feel it an opportune time to give the program an overhaul. Is the expense of federal, regional, and institutional VA offices worth the administrative expense? Let's make it simple and you know it can be. Give them their months of entitlement and only certify that they're going to school and completing each quarter. In other words, pay by the month and not the credit and get rid of the bureaucracy. Alternative: Fund the VCIP at an appropriate level. For example, I have 460 veterans and three other major programs I am directly responsible for. I need enough money to hire a veterans' coordinator to run that program. How can I do this with \$7,400 VCIP money and \$2,800 certification money?"

New York: "VA reporting fees for certification should be increased and paid twice per academic year." ---- "I feel that we work for the VA, when we should be being assisted by the VA. After all, who's chartered to care for veterans and their families?" ---- "I am concerned about repeated calls from VARO for duplicate certifications, we send them and somehow the VA mislays them."

Ohio: "VA Regulations make it virtually impossible for institutions

to comply with requirements without violating their academic integrity and/or changing their academic policies."

Pennsylvania: I am concerned about "veterans not receiving checks and the necessary duplication of certification forms."

Tennessee: I am concerned about "VA's attempt to change their policy to eliminate advance pay and require quarterly certification."

Texas: I am concerned that "vets with pending issues are never notified of the reason for the delay or that there will even be a delay. Far too often inquiries go way beyond the 10 to 14 day wait and vets are forced to initiate a congressional inquiry."-----I am concerned about "slow processing by VA, delayed checks to vets."

Virginia: I am concerned about "the carelessness of some VA employees in handling the certifications, etc. The threat of school liability assessment is always hanging over us."

Wisconsin: "VA certification, given our small population, is not a problem. However, we are as concerned as others about prospects of extensions and vets benefit erosion."

SURVEY RESULTS

	<u>JR COLLS</u> <u>All</u>	<u>JR COLLS</u> <u>No Liability</u>	<u>JR COLLS</u> <u>Liability</u>	<u>SR COLLS</u> <u>All</u>
Total Colleges	1,084	1,084	1,084	2,005
1. % of response	42%	37%	5%	4%
2. Total veteran students certified as of 10/31/84	159,944	159,944	159,944	160,167
3. % of veteran students per survey	83%	70%	13%	21%
4. Liability within past five years?				
Yes	11%	---	100%	8%
No	89%	100%	---	92%
5. Basis of liability assessment?				
30 day reporting deadline	64%	---	64%	71%
Last date of attendance	40%	---	40%	43%
Courses n/a to degree plan	26%	---	26%	29%
Insufficient prior credit	18%	---	18%	14%
Other	22%	---	22%	57%
6. How liability assessment resolved?				
By VA waiver	50%	---	50%	28½%
Paid VA	16%	---	16%	28½%
Pending VA decision	24%	---	24%	43%
Pending court decision	10%	---	10%	---
7. Institution has attendance policy?				
No	18%	18%	18%	54%
Yes - all students	60%	61%	58%	34%
Yes - veterans only	22%	21%	24%	12%

		<u>JR COLLS</u> <u>All</u>	<u>JR COLLS</u> <u>No Liability</u>	<u>JR COLLS</u> <u>Liability</u>	<u>SR COLLS</u> <u>All</u>
8.	Was attendance policy created to satisfy VA?				
	Yes	41%	38%	61%	37½%
	No	57%	60%	37%	62½%
	No response	2%	2%	2%	---
9.	Date used for last date of attendance?				
	Provided by instructor	41%	41%	40%	17%
	Date officially approved	37%	38%	24%	61%
	*Student statement	5%	5%	2%	4%
	Combination of methods	22%	21%	36%	18%
	*No junior college respondent listed this method as being exclusively in use.				
10.	Extent VA reporting requirements a problem for institution?				
	None	7%	7%	2%	4%
	Nominal	22%	23%	14%	37%
	Somewhat	26%	27%	20%	16%
	Moderate	26%	26%	24%	22%
	Large	18%	16%	40%	21%
11.	Extend VA reporting fee covers cost of certification?				
	Exceeds	.2%	.1%	---	---
	About same	4%	4%	---	9%
	Somewhat below	15%	16%	12%	13%
	Much below	77%	76%	84%	77%

	<u>JR COLLS</u> <u>All</u>	<u>JR COLLS</u> <u>No Liability</u>	<u>JR COLLS</u> <u>Liability</u>	<u>SR COLLS</u> <u>All</u>
12. Total dollars spent per survey	\$9,405,433	\$7,509,517	\$1,895,916	\$1,948,013
Veterans used in calculation	122,408	102,090	20,318	28,682
Average certification cost	\$76.84	\$73.56	\$93.31	\$67.92
No response to question	92	87	5	19
13. What are problems? (multiple responses allowed)				
Frequent changes in VA Regs	56%	54%	70%	60%
Frequent changes in RO procedures	37%	36%	46%	38%
Quality of communications with RO	36%	35%	44%	40%
Communications/procedures of SAA	15%	15%	18%	9%
VA intrusion into institutional policies and procedures	33%	31%	46%	38%
School liability assessments	16%	12%	44%	18%
Acceptable procedures for obtaining last dates of attendance	27%	24%	48%	26%
Transcript evaluation/degree plans	34%	35%	30%	39%
Frequency of certification	37%	37%	32%	47%
*Other	20%	21%	16%	22%
No response	7%	7%	4%	3%
*Most frequently cited 'other'				
Incorrect/inadequate/inconsistent information from RO	26%			53%
Lost paperwork/resubmit paperwork/payment delays/processing delays	26%			68%
Inconsistent interpretation of VA Regs/inconsistent awarding of benefit payments by RO	13%			32%
NCD course requirements	13%			---
Reporting fee	---			16%
Standard class sessions	6%			16%

Data for Tables 1 - 11 was prepared by Dr. Horace Griffiths,
Director of Research for Tarrant County Junior College.

TABLE 1
INSTITUTIONS BY ENROLLMENT

<u>ENROLLMENT</u>	<u>PERCENT</u>
Under 1,000	9.7
1,000 - 2,999	33.8
3,000 - 4,999	19.1
5,000 - 8,999	21.1
9,000 - 12,999	8.3
13,000 - above	9.0

TABLE 2

PERCENTAGE OF VETERANS TO TOTAL ENROLLMENT

	<u>All</u>	<u>Under 1000</u>	<u>1000-2999</u>	<u>3000-4999</u>	<u>5000-8999</u>	<u>9000-12999</u>	<u>13000-Above</u>
<u>PERCENT</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>
0-1	5.3	11.4	4.7	3.5	0.0	13.3	9.7
2-3	26.5	18.2	20.8	21.8	31.2	42.1	41.5
4-5	27.5	15.9	30.2	36.8	25.0	18.4	24.4
6-7	17.1	18.2	16.1	18.4	21.9	18.4	4.9
8-9	10.6	18.2	11.4	9.2	9.4	2.6	12.2
10-11	5.3	4.5	6.0	5.7	4.2	2.6	7.3
12-13	2.6	4.5	4.0	0.0	3.1	2.6	0.0
14-above	4.6	9.1	6.0	3.5	5.2	0.0	0.0
No Response	.5	0.0	.8	1.1	0.0	0.0	0.0
TOTAL	100.0	100.0	100.0	100.0	100.0	100.0	100.0

TABLE 3

INSTITUTIONS ASSESSED LIABILITY

	<u>All</u>	<u>Under 1000</u>	<u>1000-2999</u>	<u>3000-4999</u>	<u>5000-8999</u>	<u>9000-12999</u>	<u>13000-Above</u>
<u>ASSESSED</u> <u>LIABILITY?</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>
No	88.4	95.5	91.3	88.4	86.5	89.5	75.6
Yes	11.0	4.5	7.4	10.5	13.5	10.5	24.4
No Response	.6	0.0	1.3	1.1	0.0	0.0	0.0
TOTAL	100.0	100.0	100.0	100.0	100.0	100.0	100.0

TABLE 4

REASONS FOR INSTITUTION'S LIABILITIES

	<u>ALL</u>	<u>Under 1000</u>	<u>1000-2999</u>	<u>3000-4999</u>	<u>5000-8999</u>	<u>9000-12999</u>	<u>13000-Above</u>
Reasons for Liability	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>
Reporting deadline	37.3	50.0	16.7	30.0	61.5	25.0	40.0
"Last date of attendance"	15.7	0.0	25.0	20.0	15.4	25.0	0.0
Courses not applicable to degree	7.8	0.0	8.3	10.0	0.0	25.0	10.0
Insufficient credit	3.9	0.0	8.3	0.0	0.0	25.0	0.0
Other	7.8	50.0	0.0	10.0	7.7	0.0	10.0
Combination of above	<u>27.5</u>	<u>0.0</u>	<u>41.7</u>	<u>30.0</u>	<u>15.4</u>	<u>0.0</u>	<u>40.0</u>
TOTAL	100.0	100.0	100.0	100.0	100.0	100.0	100.0

TABLE 5
RESOLUTIONS OF LIABILITY

	<u>All</u>	<u>Under 1000</u>	<u>1000-2999</u>	<u>3000-4999</u>	<u>5000-8999</u>	<u>9000-12999</u>	<u>13000-Above</u>
	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>
VA Waiver	47.1	50.0	41.7	50.0	46.1	50.0	50.0
Paying VA	23.5	0.0	16.7	30.0	30.8	50.0	10.0
Pending VA							
Decision	17.6	0.0	33.3	20.0	0.0	0.0	30.0
Pending Court							
Decision	9.8	0.0	8.3	0.0	23.1	0.0	10.0
Other	<u>2.0</u>	<u>50.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
TOTAL	100.0	100.0	100.0	100.0	100.0	100.0	100.0

TABLE 6

EXISTENCE OF INSTITUTIONAL ATTENDANCE POLICY

	<u>All</u>	<u>Under 1000</u>	<u>1000-2999</u>	<u>3000-4999</u>	<u>5000-8999</u>	<u>9000-12999</u>	<u>13000-Above</u>
	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>
No	19.3	22.7	16.8	18.4	24.0	25.1	14.6
Yes, All Students	62.0	72.7	61.8	64.4	51.0	60.5	73.2
Yes, Veterans Only	17.8	2.3	20.1	17.2	24.0	18.4	12.2
No Response	.9	2.3	1.3	0.0	1.0	0.0	0.0
TOTAL	100.0	100.0	100.0	100.0	100.0	100.0	100.0

TABLE 7

VA AS REASON FOR ATTENDANCE POLICY

	<u>All</u>	<u>Under 1000</u>	<u>1000-2999</u>	<u>3000-4999</u>	<u>5000-8999</u>	<u>9000-12999</u>	<u>13000-Above</u>
	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>
Yes	28.8	18.2	27.5	26.4	36.5	26.3	34.1
No	49.0	52.3	53.7	51.7	39.6	44.7	48.8
No Response*	<u>22.2</u>	<u>29.5</u>	<u>18.8</u>	<u>21.9</u>	<u>23.9</u>	<u>29.0</u>	<u>17.1</u>
TOTAL	100.0	100.0	100.0	100.0	100.0	100.0	100.0

*Includes institutions which have no attendance policy.

TABLE 8

EXTENT OF PROBLEMS IN VA REPORTING REQUIREMENTS

	<u>All</u>	<u>Under 1000</u>	<u>1000-2999</u>	<u>3000-4999</u>	<u>5000-8999</u>	<u>9000-12999</u>	<u>13000-Above</u>
	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>
None	6.6	11.4	9.4	3.5	3.1	7.9	4.9
Nominal	21.8	31.8	23.5	17.2	22.9	15.8	17.1
Somewhat	27.0	31.8	25.5	26.4	25.0	36.8	24.4
Moderate	25.9	15.9	28.2	29.9	24.0	23.7	26.8
Large	18.0	6.8	13.4	23.0	24.0	13.2	26.8
No Response	<u>.7</u>	<u>2.3</u>	<u>0.0</u>	<u>0.0</u>	<u>1.0</u>	<u>2.6</u>	<u>0.0</u>
TOTAL	100.0	100.0	100.0	100.0	100.0	100.0	100.0

TABLE 9

PROBLEMS WITH VA CERTIFICATION

	<u>All</u>	<u>Under 1000</u>	<u>1000-2999</u>	<u>3000-4999</u>	<u>5000-8999</u>	<u>9000-12999</u>	<u>13000-Above</u>
	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>
Frequent changes in VA regulations	55.2	36.4	53.0	58.6	59.4	60.5	61.0
Changes in regional office procedures	36.3	18.2	27.5	34.5	50.0	50.0	46.3
Communications with regional office	38.2	22.7	34.9	41.4	42.7	50.0	39.0
Communications procedures of SAA	15.8	6.8	14.8	24.1	15.6	10.5	17.1
VA intrusion in institutional policies	32.3	25.0	28.2	37.9	36.5	31.6	34.1
School liability assessments	15.8	11.4	12.1	11.5	17.7	15.8	39.0
Procedures of obtaining LDA	26.8	18.2	24.2	24.1	32.3	21.1	43.9
Transcript evaluations and/or degree plans	34.1	18.2	29.5	34.5	42.7	47.4	34.2
Frequency of certification reporting	36.5	43.2	34.2	35.6	37.5	36.8	36.6

TABLE 10

RELATIONSHIP OF VA REPORTING FEE TO TOTAL COST

	<u>All</u>	<u>Under 1000</u>	<u>1000-2999</u>	<u>3000-4999</u>	<u>5000-8999</u>	<u>9000-12999</u>	<u>13000- Above</u>
	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>
VA Exceeds	.9	2.3	.7	0.0	1.0	2.6	0.0
Same	4.4	18.2	4.7	2.3	1.0	0.0	2.5
Below	16.0	20.4	18.1	21.8	9.4	10.5	14.6
Much Below	73.9	50.0	67.8	73.6	87.5	86.9	75.6
No Response	<u>5.0</u>	<u>9.1</u>	<u>8.7</u>	<u>2.3</u>	<u>1.1</u>	<u>0.0</u>	<u>7.3</u>
TOTAL	100.0	100.0	100.0	100.0	100.0	100.0	100.0

TABLE 11

AVERAGE COSTS PER VETERAN

	<u>All</u>	<u>Under 1000</u>	<u>1000-2999</u>	<u>3000-4999</u>	<u>5000-8999</u>	<u>9000-12999</u>	<u>13000-Above</u>
	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>	<u>%</u>
Under \$20	5.9	0.0	10.7	6.9	4.2	0.0	2.4
\$20-39	8.3	2.3	4.7	10.3	6.2	26.3	12.2
\$40-59	13.2	0.0	7.4	9.2	21.9	18.4	31.7
\$60-79	12.1	2.3	11.4	11.5	16.7	13.2	14.6
\$80-99	7.9	9.1	4.0	9.2	10.4	10.5	9.8
\$100-119	7.7	6.8	3.4	6.9	17.7	5.3	4.9
\$120-139	5.7	2.3	5.4	10.3	4.2	5.3	4.9
\$140-159	4.0	0.0	5.4	8.2	2.1	0.0	2.4
\$160-179	2.4	0.0	2.6	3.4	3.1	2.6	0.0
\$180-199	2.2	0.0	3.4	2.3	1.0	2.6	2.4
Above \$200	5.3	4.5	9.4	3.4	2.1	2.6	4.9
Not Given	<u>25.3</u>	<u>72.7</u>	<u>32.2</u>	<u>18.4</u>	<u>10.4</u>	<u>13.2</u>	<u>9.8</u>
TOTAL	100.0	100.0	100.0	100.0	100.0	100.0	100.0

1. Institution _____
 Address _____
 V.A. representative _____ Phone # _____
 Person completing questionnaire, if other than V.A. representative _____
2. _____ Total student enrollment in Fall 1983-84
3. _____ Total number of students enrolled in Fall 1983-84 certified for V.A. educational assistance.
4. Has your institution been assessed school liability by the Veterans' Administration within the last five years:
☐ No; please continue to Question No. 7
☐ Yes; please answer following
5. The liability was assessed on the basis of (check one):
☐ 30-day reporting deadline
☐ "last date of attendance"
☐ courses not applicable to degree plan
☐ insufficient credit granted for previous training
☐ other: _____
6. Has this liability assessment been resolved:
☐ Yes, by VA waiver
☐ Yes, by paying VA
☐ Pending VA decision
☐ Pending court decision
7. Does your institution have an attendance policy?
☐ No; please continue to Question No. 9
☐ Yes, for all students
☐ Yes, for veterans only
8. If "Yes," was this policy created to satisfy VA requirements:
☐ Yes
☐ No
 Briefly state policy _____

9. In determining "last date of attendance," my institution uses:
☐ date provided by instructor
☐ date drop/withdrawal is officially approved
☐ other: _____
10. To what extent do you consider VA reporting requirements to be a problem for your institution?
☐ none
☐ nominal
☐ somewhat
☐ moderate
☐ large
11. To what extent does the VA reporting fee received by your institution offset the cost of VA certification?
☐ Fee received exceeds the cost of VA certification
☐ Fee received is about the same as cost
☐ Fee received is somewhat below cost
☐ Fee received is much below cost
12. What is the 1983-84 budget for your Veterans' Services operations; please include direct salaries, travel, and office supplies and expenses.
 \$ _____
13. If you perceive problems with the VA certification, which of these are applicable (multiple response permitted)?
☐ frequent changes in VA regulations
☐ frequent changes in regional office processing procedures
☐ quality of communications with regional office
☐ communications/procedures of State Approval Agency
☐ VA intrusion in institutional policies and procedures
☐ school liability assessments
☐ acceptable procedures of obtaining last date of attendance
☐ transcript evaluations and/or degree plans
☐ frequency of certification reporting within a year
☐ other; specify _____
14. Do you have additional concerns not covered?